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16 *Counsel for Individual and Representative  
17 Plaintiffs and the Proposed Class*

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

1 J. DOE 1 et al.,  
2 Individual and Representative Plaintiffs,  
3  
4 v.  
5 GITHUB, INC., et al.,  
6 Defendants.

Case Nos. 4:22-cv-06823-JST  
4:22-cv-07074-JST

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**DECLARATION OF JOSEPH R. SAVERI  
IN SUPPORT OF ENTRY OF  
[PROPOSED] STIPULATED  
PROTECTIVE ORDER FOR  
LITIGATION INVOLVING  
PATENTS, HIGHLY SENSITIVE  
CONFIDENTIAL INFORMATION  
AND/OR TRADE SECRETS**

Case No. 4:22-cv-06823-JST

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DECLARATION OF JOSEPH R. SAVERI IN SUPPORT OF ENTRY OF [PROPOSED] STIPULATED  
PROTECTIVE ORDER FOR LITIGATION INVOLVING PATENTS, HIGHLY SENSITIVE CONFIDENTIAL  
INFORMATION AND/OR TRADE SECRETS

1 I, Joseph R. Saveri, declare as follows:

2 1. I am an attorney duly licensed to practice in the State of California. I am a partner  
3 and founder of the Joseph Saveri Law Firm, LLP (“JSLF”), counsel of record for Plaintiffs Does  
4 1–4 in this action. I have personal knowledge of the matters stated herein and, if called upon, I  
5 could competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 in  
6 support of entry of the [Proposed] Stipulated Protective Order for Litigation Involving Patents,  
7 Highly Sensitive Confidential Information and/or Trade Secrets (“Proposed Stipulated Protective  
8 Order”), which is filed concurrently with this declaration.

9 2. Plaintiffs’ Proposed Stipulated Protective Order is identical to the Court’s Model  
10 Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information  
11 and/or Trade Secrets (“Model Order”) (available at <https://www.cand.uscourts.gov/forms/model-protective-orders/>) except as set forth below in Paragraphs 3–4 below and shown in redline in  
12 Exhibit 1, which is a tracked-changes version of the Proposed Stipulated Protective Order  
13 showing changes from the Model Order.

14 3. In the Proposed Stipulated Protective Order, the parties have added case-  
15 identifying information and included optional language delineated in the Model Order in  
16 Sections 2.4, 2.5, 2.9, 2.16, 5.2, 7.3, 7.4, 9(b), and 10(c).

17 4. The parties met and conferred regarding their preferences for certain language in  
18 Section 7.4 (Procedures for Approving or Objecting to Disclosure of “HIGHLY  
19 CONFIDENTIAL – ATTORNEYS’ EYES ONLY” or “HIGHLY CONFIDENTIAL – SOURCE  
20 CODE” Information or Items to Designated House Counsel or Experts) and ultimately  
21 compromised on one change not contemplated by the Model Order. Namely, the parties agreed  
22 to shorten the time to object to disclosure of material designated as Highly Confidential—  
23 Attorneys’ Eyes Only and/or Highly Confidential—Source Code in Section 7.4(b) from fourteen  
24 days to seven days.

1 I declare under penalty of perjury that the foregoing is true and correct.  
2 Executed this 3rd day of March, 2023 at San Francisco, California.  
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*/s/ Joseph R. Saveri*  
4 Joseph R. Saveri